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• 54 April 7, 2008

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Honorable Justice Stephen C. Robinson
 United States District Court
 Southern District of New York
 300 Quarropas Street
 White Plains, NY 10601

MEMO ENDORSED

Re: Trustees of the Teamsters Local 156 et al. vs. Realife Land Improvement, Inc.
 Docket No. 07 CIV 3468 (SCR)

Dear Honorable Judge Robinson:

This firm represents Plaintiff Trustees in the above-referenced matter. I write to request the Court's permission to file a motion for entry of default in this lawsuit.

A summons and complaint were filed on May 11, 2007. Through its former counsel, defendant filed an answer to the complaint but subsequently withdrew as counsel of record on November 27, 2007. By Order of this Court, the entire matter was stayed for a 30-day period in order to afford Defendant an opportunity to retain new counsel.

As of this date, we have not been contacted by new counsel and I am unaware of any appearance by substituted counsel.

Accordingly, I request permission to file a motion for default in order to remove this matter from the Court's docket.

Thank you for your assistance and courtesies.

Very truly yours,

BARNES, IACCARINO,
 VIRGINIA, AMBINDER &
 SHEPHERD, PLLC

By: Karen Antrospide
 Karen Antrospide, Esq.

APPLICATION GRANTED
Stephen C. Robinson

HON. STEPHEN C. ROBINSON

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